CHOCF / HOIAR
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02/23/09

"KENT Mavis D" <KENT.Mavis@deq.state.or.us>
02/23/2009 10:09 AM

To Christopher Cora/R10/USEPA/US@EPA
cc
bcc
Subject Harbor Oil VG Comments 1/6/09

History: This message has been replied to.

Chris, I am a little late getting comments to you but needed to coordinate with someone else, then I am not in on Fridays. Here are my comments on the email Voluntary Group comments dated 1/6/09.

OK Response to #1: DEQ agrees with the locations and approaches to collect deeper sediment samples at three locations. The VG proposes to archive the second and deeper sample, pending results of the shallow sample. The decision criteria to analyze the deepest sample would be if the 1-3 foot samples have concentrations higher than the Phase 1 samples. I reque st that preliminary information be made available to agencies for the 1-3 foot sample so input can be provided before the holding time expires for the deepest sample.

Response to #3: DEQ agrees with the response.

Response to #4: DEQ agrees with the response.

Response to #7: for fish tissue analysis, DEQ agrees with a fish population survey. Also DEQ supports the fish consumption rate of 17.5 grams/day, in accordance with US EPA standard recreational consumption rate and also DEQ's 2007 guidance. The 17.5 grams/day consumption rate should be used for a screening level assessment.

Response to soil sampling: DEQ agrees with the response.

Response to wetland soil sampling: DEQ agrees with the response.

Response to #19: DEQ agrees with the response.

Response to #11b: DEQ guidance on vapor intrusion will be released soon but in the meantime there are essential components of the guidance that may be used now. These include use of soil vapor RBCs and a preference for use of soil vapor as a line of evidence when soil or groundwater concentrations of VOCs exceed screening levels for the vapor intrusion pathway (screening levels are available as part of the Risk-Based Decision Making guidance available on DEQ's website). The soil gas RBCs can be derived from DEQ's air RBCs, by applying an attenuation factor of 200 to residential and urban residential air RBCs, and a factor of 1,000 to occupational RBCs.

Response to #14c: DEQ agrees with the response, but please note that if for some reason

upland soil levels are high, then this approach would not be acceptable for unrestricted soil or fill, to avoid it becoming erodible.

Response to total petroleum hydrocarbon presentation: DEQ agrees with the response.

Response to residential evaluations: DEQ has no comment for this response.

Response to #18d and #19b,c: DEQ has not comment for this response.

Response to #14c(different aspect from earlier 14c response): Same DEQ comment as to above 14c comment applies here also.